

TABLE 1. RESPONSE TO PARTY COMMENTS, 2BE-SKGxxxx

ID #	SUBJECT	PARTY COMMENT	PARTY RECOMMENDATION	PROPONENT RESPONSE
CIRNAC-01	Treatment of Water from Secondary Containment	The applicant states in the waste management plan that water from the secondary containment units installed under stored fuel barrels will be treated with either a carbon filter and or an oil water separator. The concern is that a carbon filter might not be sufficient in removing the contamination from the water therefore may lead to contamination ending up in a waterbody if it is discharged less than 31 meters away from any normal high watermark of any waterbody.	CIRNAC recommends that the applicant state how they will test the treated water, from the secondary containment units, to confirm that it is safe to be will be deposited into the environment, prior to discharge.	<p>Water accumulating in secondary containment will be sampled and analysed prior to discharge, with the sample collected from the outlet of the filter.</p> <p>Manufacturer (SEI Industries) specifications for the Rain Drain activated carbon filter indicates that effluent discharged through a Rain Drain meets Canadian Council of Ministers of the Environment (CCME) <i>Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products</i>, being 15 mg/L of free oil and grease (section 3.10.3(1)i; CCME 2003). Once the filter media is saturated, it will no longer discharge and water will accumulate upstream of the filter in the containment berm; this will be detectable during routine inspection of facilities as indicated.</p> <p>Further, any discharge of treated water will occur &gt;31 m normal high watermark of any waterbody.</p>
CIRNAC-02	Excavated Materials Backfilled Material	The spill management plan indicates that the excavated areas will be backfilled with available soil, gravel, sand or bentonite, but does not indicate where these materials will be taken from.	CIRNAC recommends that the applicant clarify that the source and document the location of backfill materials selected prior to backfilling	Should a spill response require excavation and backfill, Viridis will work with the Inspector to source suitable local materials, prior to backfilling. Should local materials not be available, Viridis will work with the Inspector to confirm alternative materials prior to backfilling.
ECCC-01	Incinerator Emissions	The Proponent may incinerate combustible non-mineral waste. The burning of waste products releases numerous contaminants to the air (e.g. polycyclic aromatic hydrocarbons, heavy metals, chlorinated organics such as dioxins and furans, etc.), which can result in harmful impacts to human and wildlife health. Therefore, burning should only be considered as a waste disposal method after all other alternatives have been explored. ECCC has developed a Technical Document for Batch Waste Incineration which provides guidance on the incineration of combustibles and burnable debris, for incinerators with capacities ranging from 50 to 3000 kg of waste per batch,	ECCC recommends that the Proponent follow the guidelines in the Technical Document for Batch Waste Incineration, where appropriate. This will ensure diligent operation and maintenance of the incineration device and ensures appropriate training is provided to the personnel operating and maintaining the incinerator	Viridis will follow the guidelines in the Technical Document for Batch Waste Incineration, where appropriate.

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		with the intent of achieving the Canada-Wide Standards for Dioxins and Furans, as well as Mercury. The document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting, and can be found at the following web link: <a href="https://ec.gc.ca/gdd-mw/default.asp?lang=En&amp;n=F53EDE13-1">https://ec.gc.ca/gdd-mw/default.asp?lang=En&amp;n=F53EDE13-1</a>		
TG-01	Engagement Plan Updates	<p>In November 2022, we finalized a document that provides direction for individuals and companies to build relationships with the TG called Weghàà Eleyatits'eedi: TG Guidelines for Proponents of Development (i.e., TG Engagement Guidelines). These guidelines are based on Tłjchq Gonaewo (way of life) principles such as respect, coexistence, and inclusiveness and so we encourage everyone to initiate contact with the TG regarding their proposed plans, projects and/or activities as early as possible. This engagement is also required prior to submitting any land use permit or water licence applications with the Land and Water Boards.</p> <p>As described in the Weghàà Eleyatits'eedi and written in the Tłjchq Agreement (23.2.1), consultations with TG should include discussions on:</p> <ul style="list-style-type: none"> <li>(a) environmental impact of the activity and mitigative measures;</li> <li>(b) impact on wildlife harvesting and mitigative measures;</li> <li>(c) location of camps and facilities and other related site-specific planning concerns;</li> <li>(d) maintenance of public order including liquor and drug control;</li> <li>(e) employment of Tłjchq Citizens, business opportunities and contracts, training orientation and counselling for employees who are Tłjchq Citizens, working conditions and terms of employment;</li> <li>(f) expansion or termination of activities;</li> <li>(g) a process for future consultations; and</li> <li>(h) any other matter agreed to by the Tłjchq Government and the person consulting that government.</li> </ul>	<p>Please update the Engagement Plan to reference and be consistent with the TG Engagement Guidelines and ensure the following people are contacted:</p> <ul style="list-style-type: none"> <li>• All regulatory submissions, changes; Environmental or Wildlife issues; Seasonal Opening and/or closing of the camp; Transfer or Sale of Properties; results of the exploration program are sent to the Manager of the Regulatory Division, Violet Camsell-Blondin at <a href="mailto:Violet.CamsellBlondin@tlcho.ca">Violet.CamsellBlondin@tlcho.ca</a>, cc: <a href="mailto:lands@tlcho.ca">lands@tlcho.ca</a>;</li> <li>• Archaeological discoveries within Mqwhì Gogha Dè Nìtłèè, are sent to the Manager of Research Operation &amp; Training, Tyanna Steinwand at <a href="mailto:Tyanna.Steinwand@tlcho.ca">Tyanna.Steinwand@tlcho.ca</a>.</li> </ul> <p>For all other matters, please contact the Lands Regulation Division.</p>	<p>Viridis will update the contacts in its Engagement Plan and will notify accordingly for its activities occurring within Mqwhì Gogha Dè Nìtłèè.</p> <p>Should archaeological discoveries be made within Mqwhì Gogha Dè Nìtłèè, it will work with the TG and the Territorial Archaeologist to support TG access to the information.</p>
TG-02	Collaboration on caribou protection	The Inuit of Nunavut continue to harvest caribou in Nunavut as they have done for time immemorial and the Tłjchq desire to continue collaborating on a balanced approach relating to the protection of caribou habitat and migration of the shared herds, while at the same time recognizing room for types of sustainable economic development.	-	-

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TG-03	Protecting Hozì Ekwò (Migratory barren-ground caribou) Habitat	Many areas of critical habitat for Hozì Ekwò are outside of the Tłıchq traditional territory and are considered by Tłıchq to be important areas to protect. Kòk’etì Ekwò and Sahtì Ekwò are two transboundary migratory herds that travel from the Northwest Territories to Nunavut for essential stages of their lifecycle, such as calving and rutting. Tłıchq Elders emphasize the importance of connectivity between seasonal habitat for 1) the necessity for migratory caribou to move freely across seasonal feeding grounds throughout the entire caribou habitat; and 2) the ability for migratory caribou to move to Tłıchq traditional lands, which enables the exercise of Tłıchq harvesting rights and the practice of Tłıchq language, culture, and way of life within that habitat. Because of the great importance of protecting caribou and allowing caribou to migrate freely across its range, Tłıchq appreciate every opportunity to work together in common cause to maximize herd recovery and achieve sustainable herd numbers so as to continue the traditional harvesting of Tłıchq and Inuit alike.	TG acknowledges that Viridis Mining & Minerals has included mitigations to protect caribou within its Environment & Heritage Resources Protection Plan. TG recommends that, where delays or mitigations proposed are not feasible or practical, that Viridis Mining & Minerals also reach out to TG regarding a project-specific plan (in addition to KIA, wildlife management authorities in Nunavut, and GNWT-ENR).	Should caribou interaction with project activities be anticipated or occur within Mòwì Gogha Dè Nìtłèè and measures beyond the mitigations included in the Environment & Heritage Resources Protection Plan required, it will engage the TG.